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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

A.M., an individual,	)	
	)	
Plaintiff,	)	Case No. 3:21-cv-01674-MO
	)	
v.	)	
	)	
OMEGLE.COM LLC,	)	December 6, 2022
	)	
Defendant.	)	Portland, Oregon
_____	)	

**Oral Argument**

TRANSCRIPT OF PROCEEDINGS

BEFORE THE HONORABLE MICHAEL W. MOSMAN

UNITED STATES DISTRICT COURT SENIOR JUDGE

APPEARANCES

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(P R O C E E D I N G S)

(December 6, 2022; 1:31 p.m.)

\* \* \* \* \*

THE COURTROOM DEPUTY: We are here this afternoon for oral argument in Case No. 3:21-cv-1674-MO, A.M. versus Omegle.com LLC.

Counsel, please state your name for the record, beginning with plaintiff.

MS. GOLDBERG: Carrie Goldberg, attorneys for Plaintiff A.M. Good afternoon, Your Honor.

THE COURT: Good afternoon.

MS. LEEDS: Naomi Leeds, plaintiff -- or attorney for Plaintiff A.M.

MS. LONG: Barbara Long, also on behalf of plaintiff.

THE COURT: Thank you.

MS. GUNNING: Good morning -- or excuse me, good afternoon, Your Honor. Kimberlee Gunning for the defendant Omegle.

MS. LAY: Stacia Lay for the defendant.

MR. BALASUBRAMANI: Venkat Balasubramani also for defendant.

THE COURT: Thank you all for being here.

I thought I'd start with my tentative views on this case so that you could direct your arguments accordingly. There are six claims at issue. As to Claims 1 through 4, there

1 are important and interesting substantive arguments, but  
2 plaintiff also raises a procedural argument grounded in Rule  
3 12(g) (2), and that is a simple proposition, which is in a  
4 successive motion like this one, it forbids raising arguments  
5 that could have been raised earlier. And it seems pretty clear  
6 to me that these all could have been raised earlier. I know  
7 the temptation is to say, well, I'd just punt this problem to  
8 another day, but as it turns out, that's not quite what happens  
9 when Rule 12(g) (2) is enforced. It punts it to a different  
10 posture -- summary judgment -- and one in which it's frequently  
11 a better posture for resolving important questions.

12 But in any event, as Justice Scalia was once fond of  
13 saying, "The rule of law is the law of rules," and there it  
14 sits, codified as law in Rule 12(g) (2). I think it applies to  
15 Claims 1 through 4 such that I would deny the motion to dismiss  
16 them.

17 Claim 5 has the advantage of a recent Ninth Circuit  
18 decision in the *Reddit* case. That sets forth what I call the  
19 mens rea standard -- sort of a mens rea standard at least for  
20 claims like this one. In my view, my tentative view, the  
21 complaint, even in its most recent iteration, doesn't come  
22 close to meeting the *Reddit* standard. I'd be inclined to  
23 dismiss Claim 5. And because there's been opportunities to  
24 plead more than once, I would be inclined to dismiss it with  
25 prejudice.

1           Claim 6 is, in my view, the closest call of all of  
2   them, and so it's a close call on whether the complaint states  
3   a claim adequately for relief. Standing alone on its own, I  
4   think my view is that it survives a motion to dismiss barely.  
5   I'll be candid that since the facts and issues tied up in Claim  
6   6 are very similar to the facts and issues tied up in Claims 1  
7   through 4, then it seems foolhardy to dump Claim 6 when I'm  
8   going to go ahead with Claims 1 through 4, since it just  
9   creates, you know, an opportunity for error that isn't  
10   necessary, since we can easily take up Claim 6 at the time we  
11   take up Claims 1 through 4. So my own tentative view, although  
12   I view it as a very close call, is to deny the motion to  
13   dismiss on Claim 6.

14           Those are my tentative views. Let's start with 1  
15   through 4, and I just will typically not turn to the moving  
16   party but the party sort of against whom my tentative comments  
17   go, and that will be the defense in this case.

18           So Ms. Gunning.

19           MS. GUNNING: Thank you, Your Honor.

20           As you saw from the briefing, Omegle's position is  
21   that the Ninth Circuit standard with respect to this procedural  
22   issue is focused on whether the subsequent motion to dismiss  
23   was brought for an improper purpose and the interests of  
24   efficiency, and in this case the rules, at least in Omegle's  
25   reading, is that Omegle could still have the opportunity to

1 file a Rule 12(c) motion even if those issues relating to  
2 Claims 1 through 4 were not considered on a 12(b)(6) motion.  
3 And in this case, the plaintiff hasn't identified any improper  
4 purpose and has not identified any inefficiencies.

5 THE COURT: All right. Thank you very much.

6 For the plaintiff?

7 MS. GOLDBERG: The issue of whether Omegle is a  
8 product or a service is not an obscure one, and it's not one  
9 that would have been unknown to defendants at the time that  
10 they brought their original motion to dismiss. Our client is  
11 prejudiced by any delay. Her harms transpired years ago, and  
12 every day that we wait for her to get her day in court is  
13 prejudicial to her. We've had to delay discovery because of  
14 this additional set of briefing, and it's burdensome for us to  
15 have to relitigate an issue that Your Honor seemed to have  
16 decided.

17 That said, if we want to discuss the merits, we're  
18 here to do that and we can.

19 THE COURT: Thank you. I don't feel the need to  
20 discuss the merits on Claims 1 through 4. I think the  
21 procedural argument is valid.

22 Efficiency is an interesting question. I'm not  
23 looking -- I'm not suggesting there's something professionally  
24 improper in bringing this motion, but I think the Court ought  
25 to be wary of picking up an issue that was, I think, obvious in

1 the first go-around, and that at least I would say sort of  
2 systemically, if not individually to a particular case, raises  
3 concerns about gamesmanship.

4 More fundamentally, efficiency is fostered, again,  
5 systemically -- and that's what I think the rule cares about --  
6 when things are litigated once not twice. Here to reward the  
7 defense with picking up even the merits, let alone a victory on  
8 the merits on a motion that easily and obviously could have  
9 been brought earlier is functionally inefficient. So I deny  
10 the motion to dismiss Claims 1 through 4.

11 As to Claim 5, I said that the Ninth Circuit's  
12 decision in *Reddit*, specifically *Does 1 through 6 v. Reddit*,  
13 runs against plaintiff, and I'd be inclined to dismiss it with  
14 prejudice.

15 Do you wish to be heard further on that?

16 MS. GOLDBERG: Yes, Your Honor.

17 THE COURT: Go ahead.

18 MS. GOLDBERG: In *Jane Doe v. Reddit*, the judge said,  
19 "The dispute in this case is whether the availability of  
20 FOSTA's immunity is contingent on a plaintiff proving that a  
21 defendant-website's own conduct -- rather than its user's  
22 conduct -- resulted in a violation of 1591."

23 And the Court said yes, the violation must be for the  
24 defendant-website's own conduct and not a user's.

25 But 1595 provides for two different types of

1 trafficking liability. It provides situations where the  
2 defendant-website is actively engaged in the sex trafficking  
3 venture, and then the second type, which played out in *Reddit*,  
4 where the defendant-website benefited from others engaging in  
5 sex trafficking.

6 In our claim which we plead, we are seeking direct  
7 liability not just beneficiary liability like we saw in *Reddit*.  
8 We're saying not just that Omegle benefited from the  
9 trafficking in terms of users being attracted to the website  
10 and them making advertising revenue off of that, but they  
11 actually actively engaged in sex trafficking, and our complaint  
12 is dense with examples of their engagement in it and their  
13 knowledge of the trafficking.

14 THE COURT: Separate from knowledge, what conduct or  
15 participation by the website do you allege in a sex trafficking  
16 venture?

17 MS. GOLDBERG: Well, they offered their product to  
18 people 13 and up, as well as adults. They randomly matched  
19 children with adults. They sought no age information to keep  
20 the population separated. They said that their video streaming  
21 is unmoderated. They removed the typical social media safety  
22 measures like name, registration, age verification, social  
23 media verification. They made it so that users are  
24 untraceable. They encouraged users, including their child  
25 users, to talk to strangers. They directly distributed their



1 product to remove -- they directly distributed their product  
2 rather than an app for download to remove another layer of how  
3 law enforcers could track down abusers. They advertised  
4 pornography to children and to adults, creating a sexual  
5 environment, and they tried to bind children to an agreement  
6 with their terms of service that Omegle was not responsible for  
7 the folks who inevitably will behave inappropriately.

8 THE COURT: Thank you very much.

9 Your response?

10 MS. GUNNING: Thank you, Your Honor.

11 First, just very briefly to address the beneficiary  
12 allegations. Even the amendments to the complaint don't  
13 satisfy the standards set forth in *Reddit* and which requires  
14 that the party itself engage in knowing behavior so as to  
15 satisfy 1591.

16 Going to --

17 THE COURT: You said you were going to discuss the  
18 benefit portion and then you discussed the mens rea. So what  
19 is wrong with the complaint's recitation of benefits to your  
20 client under *Reddit*?

21 MS. GUNNING: Under *Reddit*, Your Honor, there's a  
22 requirement that the pleading be specific to the venture, that  
23 the defendant itself benefit from the venture, and there are  
24 very general allegations in the complaint but nothing specific  
25 to a venture involving Mr. Fordyce.

1 THE COURT: I'm just trying to get at your point that  
2 you stated you were about to make. You said you were going to  
3 tell me something weak about the complaint in the way it  
4 discusses benefit. I'm assuming that if the complaint is  
5 otherwise satisfactory and alleges a venture in which your  
6 client participates -- that is, rife with sex trafficking of  
7 minors -- that if that's all true, then it adequately alleges  
8 that your client received a benefit, a financial benefit from  
9 this.

10 Is there something wrong with the complaint's  
11 recitation of your client receiving a benefit as opposed to  
12 your client's direct participation in the venture, or are you  
13 only focusing on your client's direct participation in the  
14 venture?

15 MS. GUNNING: No, both, Your Honor.

16 THE COURT: So what's wrong with the complaint's  
17 description of your client directly receiving a benefit?  
18 What's missing?

19 MS. GUNNING: Well, there's no -- there's no  
20 allegation that, again, ties receipt of a benefit or even  
21 direct participation in any behaviors specifically involving --

22 THE COURT: I'm just trying to understand your  
23 argument, because when you give me a label, I run with it, and  
24 you keep telling me you're going to talk about benefit, but  
25 you're really just talking about a lack of direct

1 participation. And if there's no direct participation, then  
2 the money your client gets isn't a benefit, but if there is  
3 direct participation, then the money your client gets is a  
4 benefit. Right?

5 MS. GUNNING: If the --

6 THE COURT: So your real problem you want me to focus  
7 on is the lack of your client's direct participation, correct?

8 MS. GUNNING: Direct participation, yes.

9 THE COURT: So what's wrong -- you heard the  
10 recitation of what plaintiff believes it has alleged to show  
11 your client's involvement beyond a mere turning a blind eye.  
12 So what's missing from that recitation in light of *Reddit*?

13 MS. GUNNING: What's missing from that recitation is  
14 again anything that is specifically tied to the plaintiff in  
15 this case, Your Honor.

16 And I just want to correct -- and I apologize.  
17 Earlier when I said "benefit," I meant to say "beneficiary." I  
18 can understand that what I said was unclear, and I apologize  
19 for that.

20 But again, looking at this complaint in light of  
21 *Reddit*, nothing has been added to it that satisfies the  
22 standard that is now the standard in the Ninth Circuit.

23 THE COURT: And you contend the standard is that your  
24 client has to have participated directly in the specific  
25 conduct against the specific plaintiff?

1 MS. GUNNING: Well, a venture with Mr. Fordyce, yes.

2 THE COURT: As opposed to opening -- let's say that  
3 you had a website as a hypothetical that did all the things  
4 plaintiff alleged this one does, was aware of the risks to  
5 children by virtue of all of the parameters it sets up for its  
6 website, and generally could be viewed as participating in  
7 child sex abuse -- that is, knowing and profiting from it --  
8 but is unaware of the names of any individual victim. It just  
9 knows it's happening, knows it's profiting from it, and is  
10 happy to get the money, but doesn't know the name of any  
11 particular victim. Is that insufficient for a Claim 5 -- for a  
12 claim like Claim 5 to go ahead?

13 MS. GUNNING: Knowledge of the particular -- first of  
14 all, Your Honor, knowing the name of the victim is not  
15 necessary, given the circumstances.

16 THE COURT: You just told me that there's no link to  
17 Mr. Fordyce here. That would be knowledge of a particular  
18 victim. So I'm just asking is that necessary or could you get  
19 a Claim 5 without a company knowing the names of any victim or  
20 any individual perpetrator? It just knows there's a bunch of  
21 them out there and doesn't care and wants to make money off of  
22 it, but it couldn't name any perpetrator and it couldn't name  
23 any victim. Is the inability to name either a perpetrator or a  
24 victim, if all else is present -- which I know you contend  
25 isn't in this case, but if everything else is present but

1 there's just no individual involvement with an individual case,  
2 there's just involvement in the industry, would that be fatal  
3 to a claim like Claim 5?

4 MS. GUNNING: It would be fatal if we didn't have  
5 additional detail, Your Honor. The statute refers to "the  
6 venture" and "a person." I mean, it's very --

7 THE COURT: Your position is to have liability for a  
8 claim like Claim 5, even if a company wasn't involved in the  
9 overall business of child sex exploitation, set up a website  
10 and made profit off it, knowing it was doing it, aware that it  
11 was going on, aware that there were victims and were  
12 perpetrators, it just didn't drill down to the detail of being  
13 aware of any particular victim or any particular perpetrator,  
14 that would be fatal to a claim like Claim 5?

15 MS. GUNNING: Yes. It doesn't satisfy the standard  
16 under 1591 required to overcome Section 230 immunity.

17 THE COURT: Thank you.

18 Is that the extent of your argument or do you wish to  
19 say any more?

20 MS. GUNNING: That's the extent unless Your Honor has  
21 questions.

22 THE COURT: Thank you.

23 I'll turn to you on Claim 6. So I suggested that it  
24 barely satisfied but did satisfy the standard, and  
25 pragmatically speaking it should probably be thrown in and

1 resolve Claims 1 through 4 anyway, since it's bound up with  
2 Claims 1 through 4 at a minimum factually. What's your  
3 response?

4 MS. GUNNING: With respect to the new negligence  
5 claim, there are three different issues raised in the briefing,  
6 and I don't -- if Your Honor has a preference for which of  
7 those you'd like me to address first?

8 THE COURT: No, you go ahead.

9 MS. GUNNING: Yes. The first question is whether the  
10 Oregon so-called impact rule with respect to injury is  
11 satisfied, and if not, then has an exception to that rule,  
12 which Oregon courts have stated as a violation of a legally  
13 protected interest, and emotional distress being a foreseeable  
14 result of that violation.

15 Here there are no allegations with respect to the new  
16 negligence claim that satisfy the impact rule. And with  
17 respect to the pleading, there is an allegation in the second  
18 amended complaint as to a legally protected interest, but there  
19 are insufficient allegations -- or no allegations explaining  
20 how Omegle violated -- assuming there is a legally protected  
21 interest, how Omegle violated that legally protected interest.  
22 And the *Banana Republic* case is very clear with respect to the  
23 pleading standard when pleading this type of exception to the  
24 impact rule, and it's not -- the complaint does not state a  
25 claim with respect to that issue.

1           Another issue, another failing of the new negligence  
2 claim is that it is barred by Section 230. And it's  
3 interesting here because the plaintiff is trying to have it  
4 both ways, on the one hand arguing that the new negligence  
5 claim is exactly like Claims 1 through 4, except concerning a  
6 service not a product, but also that it's different from the  
7 product liability claims. And so, you know, the plaintiff has  
8 to pick one of those.

9           Now looking at the allegation specific to the new  
10 negligence claim, there are repeated references --

11           THE COURT: Why does the plaintiff have to pick one  
12 of those? I mean, if she -- if plaintiff claims that there is  
13 negligence as to a service and product liability as to a  
14 product, then why can't both those claims go forward?

15           I understand how if you have a -- there are  
16 situations where you'd have a statutory award of liability that  
17 you can't also allege common law negligence, there are cases  
18 where that's the point, but that's where the same interest is  
19 protected by the statute and the common law negligence. But if  
20 they're different by virtue of one being a service and one  
21 being a product, why wouldn't that evade that rule?

22           MS. GUNNING: Let me clarify what I was saying  
23 before, Your Honor.

24           THE COURT: Okay.

25           MS. GUNNING: And I apologize for the lack of

1 clarity.

2 I mean, here the new negligence claims turn on the  
3 content. They turn on the communication. The allegations are  
4 about the private and anonymous conversations, the  
5 communications and the contents. On the one hand the plaintiff  
6 is saying this is just like Claims 1 through 4, it involves a  
7 service, so we're immune. We're not immune under Section 230,  
8 but on the other hand it's pled differently and focuses on  
9 communications, so it is immune under Section 230.

10 THE COURT: So you contend that part of why I should  
11 apply Section 230 immunity is because the negligence claim is  
12 pled closer to the sorts of things for which you're immune,  
13 service?

14 MS. GUNNING: Correct. The way it's pled is the harm  
15 arises from the communications with Fordyce. It focuses on  
16 Fordyce's communication and the harms they caused. The  
17 negligent acts are framed as, you know, negligence and --  
18 alleged negligence in moderation and screening, all these  
19 traditional publisher functions. It's different from the -- I  
20 think it's Claims 3 and 4 that are the product liability claims  
21 arising in negligence. Those claims as pled are about  
22 negligent -- defective design. But this claim is pled  
23 different than that.

24 THE COURT: All right. Thank you.

25 That's one. You said you had three arguments you



1 wanted to make. That's one of them.

2 MS. GUNNING: Yes. And the third argument goes to  
3 foreseeability. And, you know, I would point to the most  
4 recent case -- I believe plaintiff cited this one -- which is  
5 the case against the West Linn School District, where the Court  
6 found that it was not reasonably foreseeable that the district  
7 would have known that this -- the teacher who apparently  
8 engaged in inappropriate if not criminal actions, that those  
9 actions were not foreseeable. And so applying a broader  
10 standard of reasonable foreseeability to Omegle than the Court  
11 in the *West Linn* case applied to events in the real world is  
12 contrary to Oregon law. I mean, there's not -- there are not  
13 allegations in the complaint that specifically go to -- excuse  
14 me, that specifically go to what happened here. It's not -- it  
15 doesn't mean --

16 THE COURT: I'm not sure I understand. First of all,  
17 the *West Linn* case is a useful case but represents simply a  
18 factual sort of data point on the question of what is  
19 foreseeable, right? It doesn't set up some different standard,  
20 it just helps us understand what is and what isn't foreseeable  
21 by giving us a factual scenario to apply. Do you agree so far?

22 MS. GUNNING: Yes. I mean --

23 THE COURT: So you say *West Linn* applies it in the  
24 real world as opposed to what? I mean, I guess I thought this  
25 was a real world case, too.

1 MS. GUNNING: We are in the real world, Your Honor,  
2 but it's different in that it's a virtual world. It's not a  
3 situation like the *West Linn* case --

4 THE COURT: Is the standard of foreseeability somehow  
5 different in this case than in *West Linn* or any other case? I  
6 understood it to be just that you have -- that the pleader  
7 would have to meet the standard of showing foreseeability, not  
8 some special standard applicable in cases involving virtual  
9 conduct. Am I missing a point there?

10 MS. GUNNING: It's correct, Your Honor, there isn't a  
11 different standard with respect to reasonable -- excuse me,  
12 foreseeability regarding --

13 THE COURT: You know what your opponent has pled  
14 about foreseeability, fundamentally that there's enough going  
15 on out there that your client would have to be an ostrich to  
16 not know this stuff. What is your response to that?

17 MS. GUNNING: Well, one thing that for purposes of  
18 the pleading -- and this is discussed in the *Piazza* case and I  
19 think it's mentioned in the *West Linn* case -- is that the  
20 circumstances and the context are important. One of the things  
21 you look at is in terms of time frame, and in this case it's  
22 alleged that the unfortunate and terrible things that  
23 Mr. Fordyce did, the contact with Omegle -- alleged contact  
24 with Omegle occurred in 2014.

25 THE COURT: Before a lot of the things that would

1 give your client perhaps some foreseeability after they  
2 occurred?

3 MS. GUNNING: Yes. The allegations in the complaint,  
4 assuming as we must that those are true for the purposes of a  
5 12(b)(6) motion. It's different than a case like *Piazza* where  
6 the Court lists all the allegations in the pleading that were  
7 both more specific to that location but also led up to that  
8 incident.

9 THE COURT: All right. Thank you very much.  
10 Did you complete your argument?

11 MS. GUNNING: I did, Your Honor, unless you have more  
12 questions.

13 THE COURT: No, thank you.  
14 I'll turn to you.

15 MS. GOLDBERG: Thank you, Your Honor. I'll take  
16 these in the order.

17 THE COURT: Let's go backwards. So let's talk about  
18 foreseeability.

19 You agree, of course, don't you, that for you to show  
20 foreseeability by virtue of sort of a body of knowledge by  
21 Omegle about how bad things are happening out there, you'd have  
22 to show those events from which you'd derive awareness and  
23 foreseeability, you'd have to show they occurred before the  
24 harm to your client, right? You can't get to foreseeability  
25 for your client's harm by subsequent events. That's obvious,

1 isn't it?

2 MS. GOLDBERG: That's obvious to us as well.

3 THE COURT: Do you do that? Do you show a body of  
4 events that predate the harm to your client here?

5 MS. GOLDBERG: We certainly -- certainly the research  
6 and the studies into Omegle and its pattern and practice of  
7 matching children with adults, the articles have postdated the  
8 harms to our client. However, the operations of Omegle have  
9 not changed since 2008, when it was developed -- or excuse me,  
10 2009.

11 THE COURT: I can't assume foreseeability. I have to  
12 have something happen that triggers foreseeability. So the  
13 fact that bad things are happening to children by virtue of the  
14 platform's structure doesn't get you foreseeability unless  
15 Omegle somehow knows it. By what mechanism did Omegle learn it  
16 prior to 2014?

17 MS. GOLDBERG: I feel that this is a factual  
18 determination.

19 THE COURT: Sure. You have to plead -- Let me ask my  
20 question.

21 It is a factual question, but you have to plead  
22 facts. The reason that it's not -- that we're not determining  
23 facts today is if you plead facts, then I'm assuming they're  
24 true, and that's how you'd win. But you don't get to move to  
25 another day just by saying it's a factual question unless you

1 have pled facts. So you have to plead foreseeability. If your  
2 studies postdate 2014, then their publication doesn't get you  
3 foreseeability. You're suggesting that the underlying events  
4 discussed in those studies might get you foreseeability, fair  
5 enough, but only if Omegle knew about them.

6 So what did you plead in your complaint to show  
7 Omegle knew these terrible things were happening during or  
8 prior to 2014?

9 MS. GOLDBERG: Well, we discuss criminal actions  
10 where Omegle's founder testified in court about -- in child  
11 predation cases. And, I mean, I really do feel that the  
12 operations of this platform, which have been consistent,  
13 inviting people 13 and up, matching them with predators,  
14 putting them into live video chat rooms makes it foreseeable.  
15 If in 2009 somebody had presented that idea and wanted an  
16 investment for their product, I think anybody would say, you're  
17 going to be matching 13-year-olds and adults for live-streaming  
18 video chats? It feels on the very face of it to be a  
19 foreseeably harmful business plan.

20 THE COURT: All right. So that's one argument, that  
21 the platform's very structure makes the harm you allege  
22 foreseeable.

23 Anything else? You say a criminal case in which the  
24 CEO testified. When did he testify?

25 MS. GOLDBERG: I don't have that information. I'm

1 not sure how far back his testimony has gone.

2 THE COURT: Do you know if it predates 2014 or not?

3 MS. GOLDBERG: I don't know.

4 THE COURT: Anything else?

5 MS. GOLDBERG: Well, with regards to foreseeability,  
6 in the *West Linn* case, the courts generally committed that  
7 question to the jury and said that the unforeseeability as a  
8 matter of law should rarely be found, and that only in extreme  
9 cases such as when the harm results from a highly unusual  
10 circumstance should it be determined as a matter of law.

11 THE COURT: I get this a lot from plaintiffs'  
12 lawyers, and so I have a job to do that I cannot evade. My job  
13 is to measure whether your complaint states a claim as a matter  
14 of law. And, of course, as I said, the grand benefit you get  
15 is you don't even have to win, you just have to say it out loud  
16 in your complaint. But it's not enough to say, oh, you know,  
17 don't grant a motion to dismiss because that should go to a  
18 jury. Well, yeah, it should go to a jury as long as you've  
19 adequately pled your claim. But we're here to decide whether  
20 you've adequately pled your claim, and the question we're  
21 focusing on is foreseeability. So I don't need a reminder that  
22 a motion to dismiss is a serious step in the case. I just need  
23 you to tell me what you put in your complaint.

24 MS. GOLDBERG: In paragraphs 115 and 117, we plead  
25 that Omegle created a foreseeable risk of harm that its

1 platform would injure plaintiff and it was negligent.

2 We discuss that Omegle was -- failed to take  
3 reasonable measures to prevent foreseeably dangerous  
4 situations.

5 THE COURT: Okay. So so far we're right squarely in  
6 the land of *Iqbal* and *Twombly* which says that you can't get  
7 there by stating legal conclusions. You've just read to me two  
8 legal conclusions. So what I'm looking for are facts.

9 MS. GOLDBERG: Well, earlier in the complaint, in the  
10 facts section, I talk about the operations. I talk about how  
11 Omegle encourages people to talk to strangers.

12 THE COURT: Okay. So one thing I'm going to keep in  
13 mind is your argument that your entire description of the way  
14 this platform is set up is -- makes child abuse so inevitable  
15 that we should call that foreseeable. And I'm taking that  
16 argument seriously. So I have that one in my mind.

17 I'm looking for anything else that you have beyond  
18 the structure of the platform that gives you foreseeability.  
19 One is you think maybe -- you're not sure, but maybe testimony  
20 by the CEO in a criminal case works. Do you know the paragraph  
21 that's in? Or is that in the complaint, his testimony in a  
22 criminal case?

23 MS. GOLDBERG: I don't know offhand.

24 THE COURT: So that's possibly two things.

25 Is there a third or a fourth fact you want to rely on

1 that triggers foreseeability?

2 MS. GOLDBERG: The gravamen is that the product made  
3 the harm so inevitable to the children.

4 THE COURT: That's your point.

5 MS. GOLDBERG: I mean, I need discovery to find out  
6 the extent to which -- Well, actually, okay. Paragraph 64.  
7 "Prior to 2014 when the Omegle predator targeted plaintiff, a  
8 series of news articles had been published to warn the public  
9 about the dangers of Omegle specific to child exploitation and  
10 abuse."

11 That was on News Channel 3.

12 And then there's one from October 21st, 2013. "OK  
13 mother says teen was sexually assaulted by man she met online,"  
14 again in the article about Omegle.

15 THE COURT: Article where?

16 MS. GOLDBERG: That was News 9. I don't know offhand  
17 if that was a television piece or an article, but we have the  
18 website linked.

19 THE COURT: That's News 9 for a particular city's  
20 local news station or what?

21 MS. GOLDBERG: It was in Oklahoma.

22 THE COURT: All right. That's all to be found in  
23 paragraph 65?

24 MS. GOLDBERG: Sixty-four.

25 And then paragraph 65 says that starting May 2015,



1 Omegle's homepage included a sentence that said, "Predators  
2 have been known to use Omegle, so please be careful."

3 It doesn't get much more clear than that.

4 THE COURT: Thank you very much.

5 I asked you to talk about foreseeability, but there  
6 were other points you wanted to make. Go ahead.

7 MS. GOLDBERG: Yes. Addressing the claim that no  
8 physical harm was alleged, sexual harms are physical harms.  
9 Our complaint extensively pleads the sexual abuse suffered,  
10 that our client was forced to perform repeated acts of sexual  
11 abuse on herself, to masturbate with objects under coercion and  
12 blackmail. Sexual abuse of children is an egregious harm.  
13 It's not tolerated by our society.

14 With regard to the *Banana Republic* case, my reading  
15 of that is that basically on an ad hoc decision, the Court can  
16 decide whether something is a legally protected interest, and  
17 they base it on the importance of that interest. In our case,  
18 we're talking about a child's interest to not be sexually  
19 abused, and there aren't more generally accepted or legally  
20 compelling interests in our society.

21 And I will now turn to the issue of Section 230  
22 vis-a-vis our negligence claim. We pleaded the negligence  
23 claim in parallel to the product liability claim. Once again,  
24 we're not suing Omegle for the conduct of a third party, we're  
25 suing Omegle for its own operations. Whether Omegle wants to

1 call itself a product or a service, we're suing Omegle for the  
2 design decisions and the operational decisions that they made  
3 which caused harm to our client.

4 Your Honor's prior ruling is controlling because once  
5 again it's a claim that does not treat the defendant as a  
6 publisher, and under no circumstances are we talking about  
7 anything that's a traditional editorial decision like we see in  
8 claims like defamation, which are traditionally the kind that  
9 Section 230 was intended to dismiss.

10 That's really all I have to say on that issue.

11 If Your Honor would give me the opportunity, I do  
12 have one other thing I'd like to say regarding the trafficking  
13 issue, if we can go back to that for one second.

14 THE COURT: Go ahead.

15 MS. GOLDBERG: I wanted to just talk about Congress's  
16 policy intentions when they created FOSTA. It was a direct  
17 response to the Backpage.com trafficking situation, where  
18 Backpage was used to traffic children, and Congress intended to  
19 give people who had been trafficked through Backpage some sort  
20 of way to hold Backpage -- not just their offender but Backpage  
21 itself liable for its participation in the venture, whether or  
22 not it knew about the specifics. It was -- the knowledge that  
23 mattered is whether or not it knows that it's assisting,  
24 supporting, and facilitating trafficking in general, because  
25 again we're not suing about just beneficiary liability but

1 about venture liability.

2           There is not really a more analogous platform to  
3 Backpage than to Omegle. We can't compare Reddit and Omegle.  
4 Reddit is an online message board where almost everything is  
5 published publicly and it's all about content moderation. And  
6 you can go on Reddit and you can talk -- you can get tips on  
7 dog training and skin care and all sorts of things. But  
8 Omegle's primary use, just like Backpage, is for predation.  
9 And we can't separate, when we're talking about the  
10 participation in the venture, we can't separate out what the  
11 general common use of that platform does and is. And in this  
12 case, Omegle is an unreasonably dangerous platform that engages  
13 actively in child sexual abuse.

14           Our client told us on Thursday when we were talking  
15 to her --

16           THE COURT: Some day I want to hear this, but not at  
17 the motion to dismiss stage. All right?

18           MS. GOLDBERG: Okay.

19           THE COURT: It's interesting when you tell me what  
20 Congress intended. Of course, it's a tough one because  
21 Congress itself, it's difficult to know what its intent is. I  
22 assume you're pointing to legislative history of some kind to  
23 tell me that you know why Congress passed this relevant piece  
24 of legislation?

25           MS. GOLDBERG: Yes, but also in the *Reddit* case

1 there's a whole section that talks about how important  
2 Congress's intention was, and it talks about Backpage.

3 THE COURT: All right. Thank you all very much.

4 I deny the motion to dismiss on procedural grounds  
5 for Claims 1 through 4. I'm going to take under advisement  
6 Claims 5 and 6.

7 But however those go, we need to go ahead with  
8 discovery. You have outstanding discovery requests out already  
9 or not?

10 MS. GOLDBERG: We have one interrogatory.

11 THE COURT: And you intend to propound others?

12 MS. GOLDBERG: Yes.

13 THE COURT: Yes?

14 MS. GUNNING: Yes, Your Honor. Currently -- and I'm  
15 guessing this is something that the counsel will need to confer  
16 on. Currently discovery is stayed 30 days after your ruling or  
17 you issue a written opinion. And the current case schedule  
18 dates will need to be adjusted, obviously.

19 THE COURT: Are you able to do that by suggesting a  
20 case management plan or do we need to hammer that out right  
21 now?

22 MS. GOLDBERG: We can suggest it. Just to clarify  
23 it, it's not 30 days following a written decision, but it's 30  
24 days following a posting on the minutes.

25 MS. GUNNING: Yes.

1           THE COURT: The minute order will go out today or  
2 tomorrow morning. So the clock ticks now. And in those 30  
3 days, are you able to produce for me a joint proposed case  
4 management plan? You can differ on some things, and then you  
5 just have it saying, you know, plaintiffs want discovery to  
6 close here and defendants want here or something like that. Or  
7 we can just sit here and hammer that out right now.

8           For plaintiff, which do you prefer?

9           MS. GOLDBERG: I feel that we can cooperate with  
10 defense counsel.

11          THE COURT: And then in -- before the end of the  
12 30-day period, I'll expect -- and it can be as soon as tomorrow  
13 or on the 29th day, but I expect a joint proposed case  
14 management plan, and I'd want to see the case move forward.

15          So if that's a reasonable plan, I'll adopt it. If  
16 there are pieces of it that I disagree with, I'll get you on  
17 the phone and we'll talk about why you think you need what  
18 you're asking for, and I'll either adjust it or not depending  
19 on how that telephone conference goes.

20          That should take us up at a minimum through summary  
21 judgment. Typically in a case like this, I would suggest that  
22 you have the pretrial order and the joint ADR report to just  
23 float. Just say they're due 30 days after I resolve summary  
24 judgment. And then that will get you through all of that.  
25 Then the only thing that would be missing would be a pretrial

1 conference date and a trial. You should feel free to go ahead  
2 and suggest a trial date, but if you don't feel like -- if what  
3 you would prefer to do is get this case all the way through  
4 summary judgment and then meet with me and confer about a trial  
5 date, that's also acceptable, whichever you all decide is more  
6 workable for your future schedules.

7 Anything further from plaintiff today?

8 MS. GOLDBERG: No, Your Honor.

9 THE COURT: For the defense?

10 MS. GUNNING: No, thank you.

11 THE COURT: Thank you all. We'll be in recess.

12 THE COURTROOM DEPUTY: All rise. Court is in recess.

13 (Proceedings concluded at 2:13 p.m.)  
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I certify, by signing below, that the foregoing is a correct transcript of the record of proceedings in the above-entitled cause. A transcript without an original signature or conformed signature is not certified.

*/s/Bonita J. Shumway*

*December 9, 2022*

BONITA J. SHUMWAY, CSR, RMR, CRR  
Official Court Reporter

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<p><b>V</b></p> <p><b>valid [1]</b> 6/21</p> <p><b>Venkat [2]</b> 2/13 3/20</p> <p><b>venture [13]</b> 8/3 8/16 9/22 9/23 9/25 10/5 10/12 10/14 12/1 13/6 26/21 27/1 27/10</p> <p><b>verification [2]</b> 8/22 8/23</p> <p><b>versus [1]</b> 3/5</p> <p><b>very [13]</b> 5/6 5/12 6/5 9/8 9/11 9/24 13/6 14/22 19/9 21/18 21/21 25/4 28/3</p> <p><b>victim [8]</b> 12/8 12/11 12/14 12/18 12/19 12/23 12/24 13/13</p> <p><b>victims [1]</b> 13/11</p> <p><b>victory [1]</b> 7/7</p> <p><b>video [3]</b> 8/20 21/14 21/18</p> <p><b>view [6]</b> 4/20 4/20 5/1 5/4 5/11 5/12</p> <p><b>viewed [1]</b> 12/6</p> <p><b>views [2]</b> 3/23 5/14</p> <p><b>violated [2]</b> 14/20 14/21</p> <p><b>violation [4]</b> 7/22 7/23 14/12 14/14</p> <p><b>virtual [2]</b> 18/2 18/8</p> <p><b>virtue [4]</b> 12/5 15/20 19/20 20/13</p> <p><b>vis [2]</b> 25/22 25/22</p> <p><b>Vogt [1]</b> 2/8</p>	<p><b>Y</b></p> <p><b>yeah [1]</b> 22/18</p> <p><b>year [1]</b> 21/17</p> <p><b>years [1]</b> 6/11</p> <p><b>yes [15]</b> 7/16 7/23 11/8 12/1 13/15 14/9 17/2 17/22 19/3 25/7 27/25 28/12 28/13 28/14 28/25</p> <p><b>you [115]</b></p>	
<p><b>W</b></p> <p><b>WA [1]</b> 2/14</p> <p><b>wait [1]</b> 6/12</p> <p><b>want [8]</b> 6/17 11/6 11/16 23/25 27/16 29/5 29/6 29/14</p> <p><b>wanted [4]</b> 17/1 21/15 25/6 26/15</p> <p><b>wants [2]</b> 12/21 25/25</p> <p><b>warn [1]</b> 24/8</p> <p><b>wary [1]</b> 6/25</p> <p><b>was [26]</b> 4/12 5/23 6/25 9/6 11/18 12/4 13/10 13/11 15/22 17/6 17/25 20/9 23/1 23/2 24/11 24/13 24/16 24/17 24/21 25/8</p>		